

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TENNESSEE
WESTERN DIVISION

SHAWANDA BRYANT,

PLAINTIFF,

vs.

CIVIL ACTION NO. _____

METHODIST HEALTHCARE,

DEFENDANT.

COMPLAINT FOR DAMAGES FOR EMPLOYMENT DISCRIMINATION

1. That this action is brought for discrimination in employment pursuant to Title VII of the Civil Rights Act of 1964, as codified and amended, 42 USC 2000e et seq, the Civil Rights Act of 1991, the Age Discrimination in Employment Act, 29 U.S.C. §§ 621 et seq., Americans with Disabilities Act of 1990 (42 U.S.C. 12111 et seq.) and the Family and Medical Leave Act of 1993.
2. That jurisdiction is conferred upon this United States District Court by the aforementioned statutes, as well as, 28 USC 1331 and 1343.
3. That jurisdiction is conferred upon this United States District Court by the Civil Rights Act of 1991 and related claims under Tennessee law.
4. That the Equal Employment Opportunity Commission has issued a Right to Sue Letter in EEOC CHARGE NO. 490-2011-00044 dated June 29, 2012 (copy attached).

5. That the Plaintiff is a 40 year old Black female resident of Memphis, Shelby County, Tennessee.
6. That the Defendant is an entity conducting business within the jurisdiction of this court and is an employer within the meaning of the cited statutes.
7. That the Plaintiff had dutifully worked for the Defendant in credit and collections from September 22, 2008 until her discriminatory discharge on June 11, 2010.
8. That Plaintiff had been on medical leave under the provisions of the FMLA. Because of a serious illness that made her unable to perform her job at the time.
9. That the Plaintiff suffered from high blood pressure, hypertension and depression caused by her employment, among other maladies.
10. That the Plaintiff was required to return to work by the Defendant even though Plaintiff had been advised by her physician not to return to work until a later date.
11. That subsequent to her return to work with restrictions, agents of the Defendant began to make false accusations against the Plaintiff, access her accounts and enter information that the Plaintiff did not and created a hostile work environment.

12. That the Defendant's agent advised that workers would not be disciplined or terminated because of "production" deficiencies.

13. That the Plaintiff was terminated because of "production" deficiencies.

14. That the reason stated by the Defendant is false and is not the true reason for Plaintiff's discharge.

15. That the Plaintiff was discharged because of her disability.

16. That the Plaintiff has been subjected to unequal terms and conditions of her employment.

17. That the Plaintiff has suffered loss of income, emotional harm, inconvenience, loss of enjoyment of life; compensatory damages in the amount of \$350,000.00.

Wherefore, Plaintiff demands judgment against the Defendant for lost wages, front pay and the value of all the employment benefits to which she would have been entitled from the date of her termination, Defendants' disparate treatment of Plaintiff, reasonable attorney fees and the costs of litigation and such other and appropriate relief as the court deems just.

Plaintiff demands a jury to hear the suitable issues in this cause.

/s/ **Gerald S. Green**_____

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